

Solvent Metal Cleaning RACT

SBCA-SOR2-0500

Wisconsin created a regulation to control air pollution from solvent metal cleaning operations in 1980. The Clean Air Act Amendments of 1990 revised this regulation, requiring states with ozone problems to reduce volatile organic compound (VOC) pollution -- a primary precursor to ozone. Solvent metal cleaning is one of the largest industrial sources of VOCs in Wisconsin. This factsheet summarizes Wisconsin's solvent metal cleaning standard, which can be found in section NR 423.03 of the Wisconsin Administrative Code (Wis. Adm. Code).

Does This Regulation Affect My Business?

The purpose of this summary is to help you understand how a new Reasonably Available Control Technology (RACT) rule may affect businesses involved in solvent metal cleaning. The location and size of your business determine whether this rule applies to you.

If you clean metal parts, you probably are affected by s. NR 423.03, Wis. Adm. Code. You may be exempt from it, or it may not apply to you, if you use one of the following:

- a photochemically unreactive solvent (such as methylene chloride or 1,1,1-trichloroethane); or
- a solvent with 2 percent VOC content (by volume) or less.

If you are exempt, you likely will be required to keep records of the solvent you use to support your exemption.

If you use methylene chloride, 1,1,1-trichloroethane or other halogenated solvents you may be affected by a national regulation. Contact your local air inspector or the Small Business Clean Air Assistance Program for more information.

This regulation affects businesses throughout the state; however, recent amendments to the law apply only to operations in the ozone nonattainment area. This area is the southeast shoreline of Lake Michigan.

Affected counties include:

Kenosha	Kewaunee	Manitowoc
Milwaukee	Ozaukee	Racine
Sheboygan	Washington	Waukesha

If your degreasing operation is not located in these counties, then the requirements of this standard have not significantly changed for you. The charts in this summary outline the requirements for businesses both inside and outside the ozone nonattainment area.

Throughout the state, the following types of degreasers are affected:

- ❶ Cold Cleaners
- ❷ Conveyorized Vapor Cleaners
- ❸ Open Top (Batch) Vapor Cleaners
- ❹ Conveyorized Non-Vapor Cleaners

Which Parts of the Rule Affect My Business?

The location of your business, type of degreaser used, and the amount of air pollution emitted determine which requirements affect your business. The attached chart organizes the requirements as follows:

- ❶ Equipment Standards
- ❷ Pollution Control Device Requirements
- ❸ Operating Requirements
- ❹ Recordkeeping

Some businesses are subject to all of these requirements, some are subject to everything except the pollution control device

requirements, and others are exempt from the entire standard except for recordkeeping.

Outside the Nonattainment Area

You may be exempt from this regulation (except for recordkeeping) if your degreaser meets one of these emission exemptions:

Cold Cleaners with a throughput less than 1.5 gallons of solvent per day.

Open Top (Batch) Vapor Cleaners emitting less than 15 pounds of VOC per day.

Conveyorized Vapor or Non-Vapor Cleaners emitting less than 15 pounds of VOC per day.

If your degreaser does not meet one these exemptions, you may still be exempt from just the pollution control device requirements if your degreaser meets one of the following size cutoffs for the surface area of the opening:

- Cold Cleaners - 1.1 ft²
- Open Top (Batch) Vapor Cleaners - 10.8 ft²
- Conveyorized Vapor/Non-Vapor Cleaners - 21.6ft²

If your degreaser does not meet either of these exemptions, than you are subject to all of the requirements of this standard.

Inside the Ozone Nonattainment Area

You may be exempt from the pollution control device requirements if your degreaser meets one of these exemptions:

- Cold Cleaners - your throughput is less than 1.5 gallons of solvent per day, and an open area smaller than 1.1 sq. ft.
- Open Top Vapor Cleaners - emits less than 15 pounds of VOC per day, and has an open area smaller than 10.8 sq. ft.

- Conveyorized Cleaners - emits less than 15 pounds of VOC per day, and has an open area smaller than 21.6 sq. ft.
- Wipe Cleaning - emits less than 15 pounds of pounds of VOC per day.

How Do I Comply?

Refer to Attachment 1 to identify what you must do to comply with equipment standards, pollution control device requirements and operating requirements.

RECORDKEEPING

If you are subject to all of the requirements of this standard, or to everything except the pollution control device requirements, you need to keep appropriate records to show that you are in compliance. If you are exempt from this standard, you need to keep appropriate records to support your exemption. Applicable recordkeeping requirements can be found in chs. NR 423 and NR 439. If your degreaser is located in the ozone nonattainment area, records to support your exemption should include:

- ❶ A unique name or identification number for each degreaser or wipe cleaning operation.
- ❷ The volume of solvent used or added per day in each individual degreaser or wipe cleaning operation, in units of gallons.
- ❸ The VOC emission per day from each individual degreaser or wipe cleaning operation, in units of pounds or kilograms.
- ❹ The density of the solvent used, in units of pounds per gallon.
- ❺ The VOC content of the solvent, expressed as percent of VOC by volume of solvent.

When Do I Need to Comply?

Businesses both in and outside of the Ozone Nonattainment Counties should be in compliance with this regulation at this time. If you are not in compliance, contact your DNR local air inspector to arrange a compliance schedule.



Contacts for More Information or Assistance.

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.

For further information on the solvent cleaning RACT rule contact your DNR Regional or Service Center office shown on the **DNR Contact Fact Sheet** or the DNR's Central office at 608/266-2856.